REMARKS

Reconsideration of this application as amended is respectfully requested.

Claims 1-12 stand rejected under 35 U.S.C. §103(a) as being obvious under European Patent Application No. 0 520 459 A2 of Flynn (Flynn).

Claims 1-12 have not been amended. New claims 13-17 have been added, but present no new matter.

The Examiner has rejected claims 1-12 under 35 U.S.C. §103 as being unpatentable over Flynn. The Examiner has stated that

> As per claims 1, 5, and 9 Flynn substantially teaches a method of updating a message from a first version to an upgraded version by chaining through intermediate versions as claimed, comprises receiving an update message having a first version format (thus, earlier versions of index entries indicate changes that were made to the set of first identification tags, which is readable as receiving an update message having a first version format) (see col. 6, lines 3-5). But, Flynn does not explicitly indicate the step of repeatedly generating a revised update message having a next most recent version format based on the update message until a final update message having an upgraded version format is generated. However, Flynn implicitly shows step of the set of all first identification tags for information objects which had the descriptor assigned to them during indexing is logically stored with that index entry, this set of first identification tags is versioned, the latest version is stored completely as a set of first identification tags; which is readable as repeatedly generating a revised update message having a next most recent version format based on the update message until a final update message having an upgraded version format is generated (see cols. 1 and 2, lines 56-58 and 1-3). Also, in columns 4 and 15; lines 1 through 5; and 42 through 49, Flynn teaches the step of the delta changes are encoded representations of the changes that are used to generate an older version of an information object or index entry from the latest version; and teaches the prior field/value pair moved from the latest version of the object to the prior version, the object id is then removed from the latest version of the set index entries for the modified field/value pair was removed. Further, Flynn teaches another approach is to store the version together in which case versions after the original information object may only need to be represented by their difference from the previous version. Thus, it would have been obvious to a person of ordinary in the art at time the invention was made to modify the teachings of Flynn with the step of repeatedly generating a revised update message having a next most recent version format based on the update message until a final update message having an upgraded version format is generated. This modification would allow

the teachings of Flynn to provide a user with an historical perspective into database of information objects through an efficient method and apparatus for versioning information objects stored in a database as well as an index representative of the information objects (see col. 3, lines 32-37).

(p. 2-3 Office Action 3/08/01).

Applicants respectfully submit, however that claims 1-12 are not anticipated under 35 U.S.C. §103 by Flynn.

Claim 1 includes the limitations

receiving an update message having a first version format;

(Claim 1) (emphasis added).

Claim 5 includes the limitations

receipt of an update message having a first version format;

(Claim 5) (emphasis added).

Claim 9 includes the limitations

means for receiving an update message having a first version format;

(Claim 9) (emphasis added).

In contrast, Flynn does not receive an update message having a first version format. In the citation referenced by the Examiner, Flynn discloses that

Earlier versions of index entries indicate changes that were made to the set of first identification tags, at particular delta times; these are appended to the latest set of first identification tags in descending version order.

(Flynn Col. 6, lines 3-7).

In other words, Flynn stores changes made to a database by applying a two-tier of identification tag system. The identification tags are used by an indexing system to answer queries about earlier versions of the database. Flynn makes no reference to an update message. In contrast, claims 1, 5, and 9 refer to receiving an update message

having a first version format. Additionally, the applicants submit that Flynn does not disclose repeatedly generating a revised update message having a next most recent version format based on the update message until a final update message having an upgraded version format is generated.

Given that claims 2-4, 6-8, and 10-12 depend from claims 1, 5, and 9, applicants submit that claims 2-4, 6-8, and 10-12 are not obvious under 35 U.S.C. §103 by the reference cited by the Examiner, for at least these reasons. Therefore, claims 1-12 are not obvious under 35 U.S.C. §103 by the references cited by the Examiner, for at least these reasons.

Added claims 13-17 are supported in the specification. Claim 13 includes the limitation, "a network switching device to receive an update message having a first version format." Flynn fails to anticipate claim 13 for similar reasons as discussed for claims 1-12 above.

Applicants therefore submit that the rejections and objections have been overcome. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Stephen Neal at (408) 720-8300.

If any fee is due not covered by any check submitted please charge Deposit Account No. 02-2666.

Respectfully submitted,

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MARKED-UP VERSION TO SHOW CHANGES MADE

IN THE CLAIMS:

Please add claims 13-17 as follows:

13. (New) An apparatus for updating a message from a first version to an upgraded version by chaining through intermediate versions comprising:

a network switching device to receive an update message having a first version format; and,

a controller card to repeatedly generate a revised update message having a next most recent version format based on the update message until a final update message having an upgraded version format is generated.

14. (New) The apparatus of claim 13, wherein the network switching device receives a first update message.

15. (New) The apparatus of claim 14, further comprising:

a mapper to call a next most recent version mapping function to map contents of the first update message to generate a second update message.

16. (New) The apparatus of claim 13, wherein the update message includes a set of records for a database in the first version.

17. (New) The apparatus of claim 16, wherein the set of records for the database in the first version is a complete set of records for the database.